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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**CONSUMER CELLULAR,
INCORPORATED**, an Oregon corporation,

Plaintiff,

v.

CONSUMERAFFAIRS.COM, INC., a
Nevada corporation; **CONSUMERS
UNIFIED, LLC**, a Nevada limited liability
company; and **DAVID ZACHARY
CARMAN**,

Defendants.

Case No.: 3:15-cv-01908-PK

**DECLARATION OF ROBERT B.
LOWRY IN SUPPORT OF
PLAINTIFF'S UNOPPOSED
MOTION TO EXTEND
DISCOVERY DEADLINE AND
CORRESPONDING PRETRIAL
DEADLINES**

Pursuant to 28 USC § 1746, I, Robert B. Lowry, declare:

1. I am one of the attorneys for the Plaintiff in the above-entitled case. I make this declaration upon my personal knowledge of the facts stated herein and I am competent to testify to the same.

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2. Before filing Plaintiff's Unopposed Motion to Extend Discovery Deadline and Corresponding Pretrial Deadlines (Motion) I conferred with Defendants' counsel, Duane Bosworth. Mr. Bosworth stated that he does not oppose and concurs with the complete contents of the motion, including the reasons and dates stated therein as follows:

<u>Deadline</u>	<u>Current</u>	<u>Proposed</u>
Discovery	February 8, 2016	June 7, 2016 (120 days)
Dispositive Motions	February 8, 2016	July 22, 2016
Joint ADR Report	March 7, 2016	July 22, 2016
Pretrial Order	March 7, 2016	30 days after ruling on dispositive motions

3. There have previously been no time extensions of case management deadlines in this case. A Rule 16 conference has not been held while a special motion to strike remains pending.

4. There is good cause for the deadlines to be reset while the special motion to strike remains pending. No trial date has been set.

5. The Motion is filed in good faith and not for the purpose of harassment or delay.

Pursuant to 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5th day of February, 2016.

s/Robert B. Lowry

Robert B. Lowry

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